

**Category #44:**

The State should develop advanced custodial cleaning practices.

**State Response:**

Training/consulting is essential to the on-going and successful implementation of this legislation. The concept of obtaining funding to help all school districts afford objective, effective training on best cleaning practices, behavioral modification and change management is something the State would be interesting in working on with all interested parties. Considering that most cleaning budgets are probably about 5-10% product, and 90-95% labor costs, one can appreciate the importance of understanding and motivating staff. This area will continue to be a focus of our efforts as we develop the revised guidelines and develop a sample list of approved green cleaning products as required by the legislation.

**Frequently Asked Public Comment:**

Guideline Section IV. Consulting to Develop Advanced Custodial Cleaning Practices

--As you are aware, green cleaning practices are already in place in many school districts. Proper use of products is essential. Best cleaning methods and techniques should be replicated. We urge OGS and the state Education Department to utilize district expertise in the formulation of any advanced custodial cleaning practices. Additional state funding should also be provided to schools to help facilitate training in the use of these new products and technologies.

(Diane S. Ward, Governmental Relations Representative, NYS School Boards Association)

--We would like to take training very seriously - does not matter if a customer wants our firm to spend 20 hours or 100 hours--We are offering total FREE CONSULTATION-- Until the customers totally feel comfortable. Unlike many distributors--Green Star Solutions as Consulting Distributors--will not promote one company over others,

(However at Green Star Solutions, We strongly believe in highest standards--and we do believe in Green Seal Certified Products!! Green Star Solutions will present at least three different companies and finally it is the customer who makes the final decision, depending on the performance levels and comfort level. By dealing with end users for the past 10-15 years, we have made a simple realization--the biggest fear of human beings is Change-- With that understanding Green Star Solutions passionate goal is to help the customers with CHANGE MANAGEMENT associated with SMOOTH TRANSITION into Green Procurement and Implementation.

(Dr. Monica Pierce, Sukumar Associates, DBA Green Star Solutions)

--Include provisions for "other services" such as Certification Training Programs and Software Work loading Programs for Public Schools.

(R.E. "Skip" Seal, Northeast Division Manager, Spartan Chemical Company, Inc.)

--(Original) Section IV. Consulting to Develop Advanced Custodial Practices

1. In this section, it is unclear who would issue the separate bid it refers to – OGS or each school. If OGS is issuing the bid, some of the information in this section would be irrelevant for a school. What would be important is how the school could access the consulting services.
2. Assuming that OGS will be issuing the bid for the services: This section currently seems to focus on enlisting the help of consultants to address mostly behavior change and information management issues rather than provide guidance on implementing new cleaning practices. We recommend that the consultants not stop at selecting the correct products, behavior change and information management issues, but address best practices important for a cleaning operation when the new products are in use. Examples of additional topics to cover include: best practices for cleaning specific environments (e.g. bathrooms, food areas, etc.), identifying applications

where disinfection is necessary and where it is not. Those are the areas in which the manufacturer representatives may not be able to provide comprehensive information – thus the consulting services would complement the training provided by the manufacturer. In addition, consultants may help develop training materials that all manufacturers may be required to use for staff training (i.e. required training content that every manufacturer would have to deliver), thus making the distribution of some of this valuable information more effective.

(Marcia Deegler, Operational Services Division, Environmental Purchasing Program Manager and Dmitriy Nikolayev, Operational Services Division, Deputy Procurement Team Leader, Facilities)

#### --CONSULTING TO DEVELOP ADVANCED CUSTODIAL PRACTICES

Recommended Change: ~~A separate bid will be issued for the “Consulting to Develop Advanced Custodial Cleaning Practices”. Professional consulting companies may offer “Consulting to Develop Advanced Custodial Cleaning Practices” to help enhance a custodial department’s systems and reinforce the logic not to use a product until custodial staff understand the basics of proper cleaning practices. This will be a voluntary opportunity for all public and nonpublic elementary and secondary schools in the state to use to their advantage. Ideally, this consulting should occur prior to the purchase of the cleaning products. Then, armed with the benefits of enhanced systems and restructured information, a basic understanding of pH, costs of labor vs. costs of products, and the chemicals staff are empowered to use, a more educated and informed decision can be made concerning the type of products needed and how best to use them. In addition, a good consulting program must focus on the psychological side of managing people, communication, interpersonal skills, motivation, and understanding change. Considering that most cleaning budgets are probably about 5-10% product, and 90-95% labor costs, 10 and one can appreciate the importance of understanding and motivating staff. Consulting needs to be a combination of on-site training and distance learning.~~

Justification and Recommendation: This section goes beyond the scope of the statute. In addition, this type of product support should be a requirement for vendors providing products under these guidelines. Further, vendors providing environmentally preferable Green Seal Certified products provide this service to their customers. The cost of the training is factored into the cost of the product.

(Signed By: David Brooks (Malone CSD), President & Frederick Koelbel (West Islip UFSD), 1<sup>st</sup> Vice President, Legislative Committee Chairman)(Submitted By: Kathleen Van De Loo, Executive Director, (NYS SBGA) NYS Association for Superintendents of School Buildings and Grounds, Inc., Albany, NY)

--Under your “Consulting to Develop Advanced Custodial Practices” section, I would like to introduce the IICRC Apprentice/Basic Skills Program. This is a 4-6 hour program that provides basic skill/introductory training for cleaning and custodial workers. It is an excellent program designed to train regular cleaning staff the basic principles of a cleaning or maintenance discipline.

As written, these guidelines appear to limit chemical testing and evaluation to a single parochial entity, rather than acknowledging other testing programs for specific products, which have been in existence for several years. Moreover, the guidelines appear to endorse cleaning procedures that are without an established basis in science.

(Carey Vermeulen, President, Institute of Inspection, Cleaning, and Restoration Certification, (IICRC) Institute Of Inspection, Cleaning And Restoration Certification, Vancouver, WA)

#### --(F) Rather than Focusing Simply on Cleaning Products Alone, OGS' Guidelines Should Address Appropriate Cleaning Activities and Processes Used in the Entire School Building

CSPA member companies generally work closely with their customers to develop cleaning programs that reduce health and environmental impact to their customers and building occupants. Specifically, these programs focus on how cleaning and maintenance products contribute to a healthy indoor environment where building maintenance, including housekeeping and janitorial services, plays a significant role. When

evaluating health and safety, it is both the process and effectiveness of cleaning that are just as important as the products being used. For example, effective packaging minimizes solid waste, and effective dispensing minimizes chemical waste and potential exposure. A cleaning process at the scale of a building is never successful by merely selecting an "environmentally preferable" product.

The American Society for Testing and Materials (ASTM) developed a standard for environmentally preferable cleaning products in 1998. CSPA actively participated in the ASTM E50 Environmental Assessment task group with others, including the US Environmental Protection Agency, labor groups, trade associations, manufacturers, and building owners. In summary, the workgroup rejected attempts to develop a prescriptive, formula-specific standard. Instead of focusing on the products exclusively, the ASTM task group developed a guide to address appropriate cleaning activities and processes, to maximize eco-efficiency, and to minimize adverse impacts on the building occupants, cleaning personnel, the building structure, and the environment. The guide focused on the development of a stewardship plan that included the assessment of cleaning processes, product selection, storage, usage, disposal, equipment, training of cleaning personnel, and communication throughout the chain-of-commerce. The result was ASTM E1 971 - "Standard Guide on Stewardship for the Cleaning of Commercial and Institutional Buildings."<sup>12</sup>

<sup>12</sup> ASTM E1971-05 - "Standard Guide on Stewardship for the Cleaning of Commercial and Institutional Buildings," ASTM International. For referenced ASTM standards, visit the ASTM website, [www.astm.org](http://www.astm.org).

(Robert J. Kiefer, Director, Scientific and International Affairs and Joseph T. Yost, Director, State Affairs, (CSPA), Consumer Specialty Products Assoc., Washington, DC)